

August 5, 2003

Audio Division (MB)
c/o Office of the Secretary TW B204
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Petition to Modify the FM Table of Allotments, Section 73.202(b)

Dear Sirs:

I respectfully request that the FCC add Channel 259 in Silver Springs Shores, FL, to its Table of Allotments as its first local aural service. The reference coordinates for the allocation site are: 29 degrees 8 minutes 9 seconds North Latitude, 82 degrees 2 minutes 33 seconds West Longitude. These coordinates are based on the North American Datum 1927 (NAD27). This request is supported with an attached engineering study, which shows that the allocation point will serve the City of License in its entirety with a 70 dBu signal. It further shows that there are adequate separation distances (based on 47CFR73.207) to the allocation point, with the exception of the present WGNE-FM transmitter site and its new allocation point in Middleburg, FL.

WGNE (BLH-RB1104MG) is in the process of moving, and the Silver Springs Shores allocation will be clear of the location proposed in their CP application. They have applied and the Commission has granted a change in their City of License from Palatka, FL to Middleburg, FL. Although the Middleburg allocation point is not clear of the proposed Silver Springs Shores allocation point, the pending application for CP (BPH-20030417ABW) in downtown Jacksonville, FL will be clear. The site in Jacksonville will provide a city grade signal over Middleburg, with the new antenna located on a tall tower WGNE already owns. A recent check of the application status reveals that the WGNE CP request is #20 on the unblocked application list. Approval of the CP is expected in August or early September.

Should this request be granted, it is my intention to apply for it when the filing window opens. If you have any questions, feel free to contact me at (404) 729-0841. Questions concerning the engineering portion of this request may be directed to my engineer, Barry Magrill, at (904) 908-0119.

Thank you for your time and consideration of this matter.

Respectfully submitted,

Carrie A. Tutera

Carrie A. Tutera

No. 100-100000-100000
100000-100000
100000-100000

BARRY MAGRILL, P.E.

6809 Medellin Court Jacksonville, FL 32210
(Tel)904-908-0119 barry@rfengineers.com

**Engineering Comments in Support of Modification of Section 73.202(b) to add
Silver Springs Shores, FL on Channel 259**

4 August 2003

Audio Division (MB)
c/o Office of the Secretary FW B204
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Petition to modify the FM Table of Allotments, Section 73.202(b)

Dear Sirs

The attached engineering exhibits support the request that the FCC add Channel 259 in Silver Springs Shores, FL, to its Table of Allotments as its first local aural service. The reference coordinates for the allocation site are: 29 degrees 8 minutes 9 seconds North Latitude,

82 degrees 2 minutes 33 seconds West Longitude

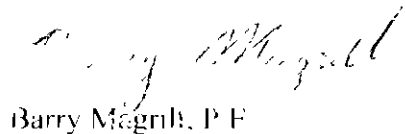
These coordinates are based on the North American Datum 1927 (NAD27). This report includes an "Area to Locate" map, a table of local stations affecting the allocation and a map showing the city grade contour from the proposed allocation point. The Study shows that the allocation point will serve the City of license in its entirety with a seventy dBu signal. It further shows that there are adequate separation distances (based on 47CFR73.207) to the allocation point with the exception of the present WGNE-FM transmitter site and its new allocation point in Middleburg, FL.

WGNE (BLH-RB1104MG) is in the process of moving. The Silver Springs Shores allocation will be clear of the location proposed in their CP application. They have applied and the Commission has granted a change in its City of License. It was changed

from Palatka, FL to Middleburg, FL. Although the Middleburg allocation point is not clear of the proposed Silver Springs Shores allocation point, the pending application for CP (BPH-20030417ABW) in downtown Jacksonville, FL will be clear. The site in Jacksonville will provide a city grade signal over Middleburg with the new antenna located on a tall tower WGNE already owns. A recent check of the application status reveals that the WGNE CP request was #20 on the unblocked application list. Approval of the CP is expected in August or early September.

If you have any questions concerning the engineering you may contact me directly at:
904 908 0119. Thank you

Respectfully,

A handwritten signature in cursive script, appearing to read "Barry Magrill".

Barry Magrill, P.E.

August 4, 2003

Output from NADCON for station Silver Springs Shores

Station Name: Silver Springs Shores

NAD 83 to NAD 27

Station ID: 01010101010101010101

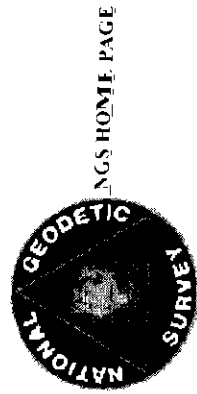
=====

Transformation # 1 Region: Conus

	Latitude	Longitude
NAD 27 datum values:	29 08 9.07828	82 02 32.68228
NAD 83 datum values:	29 08 10.00000	82 02 32.00000
NAD 27 - NAD 83 shift values:	-0.92172	0.68228 (secs.)

-28.378 18.442 (meters)

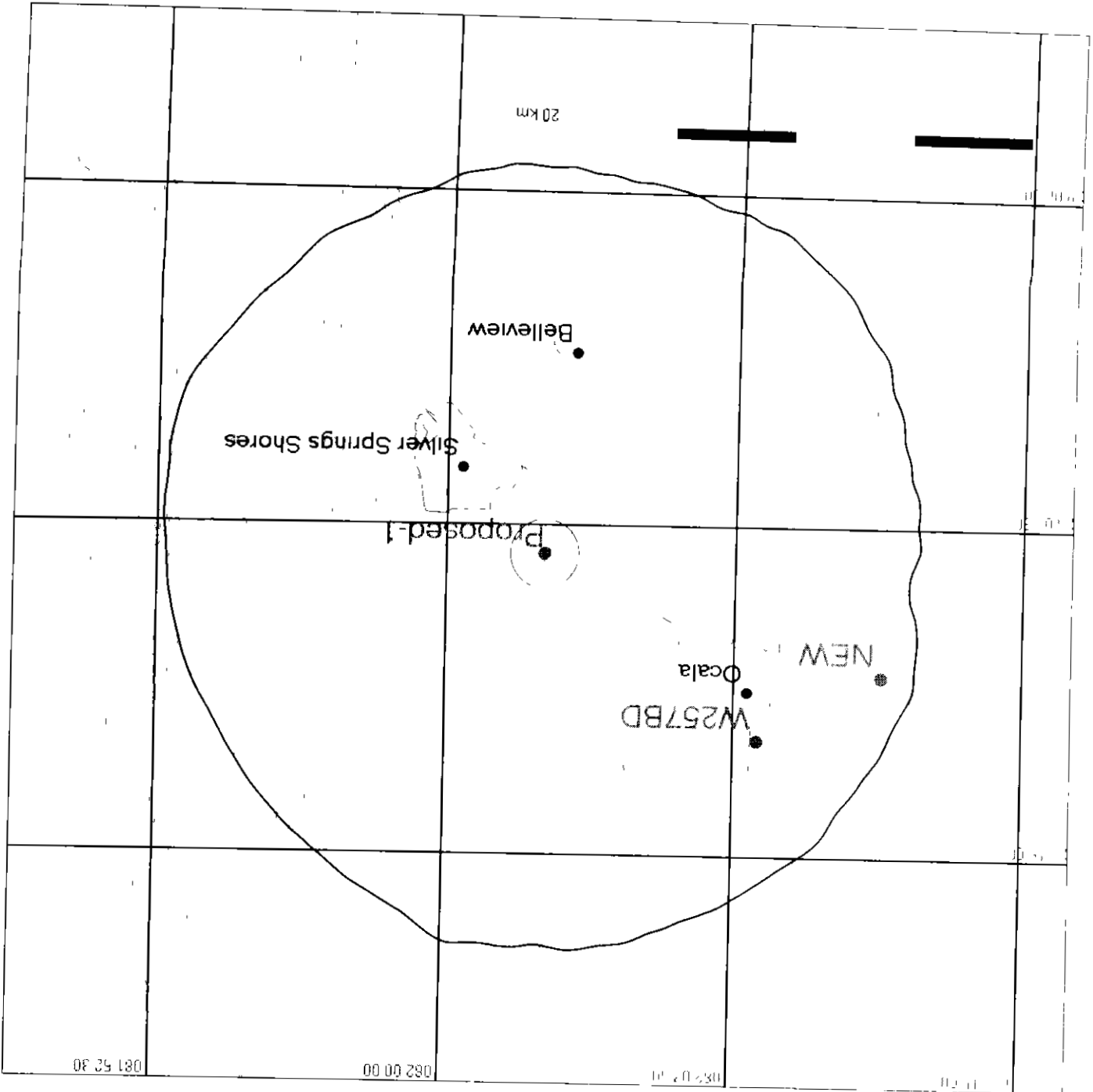
Magnitude of total shift: 33.845 (meters)



Contour Analysis

Barry Magrill
 Job Daytona Beach Shores-2 Inj
 Master Database 2003 Jul 31 fmd
 Lat N29 08 10.1 on W082 02 32 NAD-83
 Scale 1:250000
 Channel 259 Class A
 Status Licensed. Construction Permit. Application, Addition, Vacant/Reserved
 Channels Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6
 Range 93 km. Clearance FCC
 Comments No Comments
 Description Silversprings Shores City Grade

Investigator-FM Version 2.0.70
 by rSoftware, Inc
 Date 8/2/2003 12:20:57 PM
 Key
 Service
 Protected
 2nd 3rd Adj



Barry Magrill
 Job Daytona Beach Shores-2 fmj
 Master Database 2003_Jul_31 fmd
 Lat N29 08 10 Lon W082 02 32 NAD-83
 Channel 259 Class A
 Status Licensed, Construction Permit, Application, Addition, Vacant/Reserved
 Channels Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6
 Range 93 km
 Comments No Comments
 Description SilverSprings Shores Area to Locate

Page 1 of 2
 Date 8/2/2003 12 15 38 PM
 rfInvestigator-FM Version 2 0 70
 by rfSoftware, Inc

Callsign	Latitude (NAD83)	Longitude (NAD83)	City	State	Service	Channel	Class	Int'l Class	Status	73 207 Min Separatio	73 215 Min Separatio	73 207 Clearance	73 215 Clear
WGNE-FM	N29 31 09	W081 19 01	PALATKA	FL	FM	260	99	C	LIC	165	142	-82 74	-59 74
STAT RSV	N29 59 41	W081 19 38	MIDDLEBURG	FL	FM	260	99	C0	RSV	152	130	-34 27	-12 27
WBXY	N29 44 23	W082 23 08	LA CROSSE	FL	FM	258	99	A	LIC	72	49	2 76	25 76
WGNE-FM	N30 19 23	W081 38 33	MIDDLEBURG	FL	FM	260	99	C1	APP	133	111	4 14	26 14
WQYK-FM	N27 56 52	W082 27 32	ST PETERSBURG	FL	FM	258	99	C1	LIC	133	111	4 85	26 85
W257BD	N29 12 22	W082 08 07	OCALA	FL	FM	257	99	DX	LIC	0	0	11 93	11 93
NEW	N29 10 52	W082 11 20	OCALA	FL	FM	261	10	DX	APP	0	0	15 12	15 12
WSHE	N28 34 52	W081 04 31	ORLANDO	FL	FM	262	10	C	LIC	95	89	17 62	23 62
NEW	N28 54 17	W081 57 35	LADY LAKE	FL	FM	259	99	DX	APP	0	0	26 86	26 86
STAT VAC	N30 13 13	W082 53 59	LIVE OAK	FL	FM	259	99	A	VAC	115	92	31 06	54 06
STAT VAC	N29 07 50	W082 41 18	INGLIS	FL	FM	257	99	A	VAC	31	25	31 89	37 89
WQIK-FM	N30 16 35	W081 33 52	JACKSONVILLE	FL	FM	256	99	C	LIC	95	89	39 59	45 59
W257BF	N28 48 48	W081 51 26	LEESBURG	FL	FM	257	99	DX	LIC	0	0	40 05	40 05
NEW	N29 02 10	W082 27 11	DUNNELLON	FL	FM	259	99	DX	APP	0	0	41 51	41 51
NEW	N29 02 10	W082 27 11	DUNNELLON	FL	FM	259	99	DX	APP	0	0	41 51	41 51
WJIK-LP	N28 51 28	W082 19 44	INVERNESS	FL	FM	261	10	L1	LIC	0	0	41 61	41 61
WQIK-FM	N30 16 52	W081 34 11	JACKSONVILLE	FL	FM	256	99	C0	LIC	86	80	48 91	54 91
WUFT-FM	N29 42 35	W082 23 40	GAINESVILLE	FL	FM	206	89	C1	LIC	22	0	50 19	72 19
WGNX	N27 44 08	W080 27 26	VERO BEACH	FL	FM	259	99	C2	LIC	166	143	53 54	76 54
WGNX	N27 37 33	W080 33 56	VERO BEACH	FL	FM	259	99	C2	CP M	166	143	55 26	78 26
NEW	N29 17 11	W081 29 36	PIERSON	FL	FM	258	99	DX	APP	0	0	55 91	55 91
STAT VAC	N29 08 13	W083 02 06	CEDAR KEY	FL	FM	261	10	A	VAC	31	25	65 59	71 59
NEW	N29 02 12	W082 43 02	INGLIS	FL	FM	262	10	DX	APP	0	0	66 62	66 62
WKJO-LP	N28 35 45	W082 20 44	BROOKSVILLE	FL	FM	256	99	L1	CP	0	0	66 78	66 78
NEW	N29 37 52	W081 35 25	PALATKA	FL	FM	258	99	DX	APP	0	0	70 26	70 26
WKTO	N29 01 38	W081 07 17	EDGEWATER	FL	FM	205	88	C2	APP	15	0	75 46	90 46
WYFE	N28 22 40	W082 40 24	TARPON SPRING	FL	FM	205	88	C1	LIC	22	0	82 22	104 22
NEW	N29 33 39	W081 16 06	PALM COAST	FL	FM	258	99	DX	APP	0	0	88 68	88 68

Barry Magrill

Job Daytona Beach Shores-2 fmj

Master Database 2003_Jul_31 fmd

Lat N29 08 10 Lon W082 02 32 NAD-83

Channel 259 Class A

Status Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range 93 km

Comments No Comments

Description SilverSprings Shores Area to Locate

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Date 8/2/2003 12 15 42 PM

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ERP	HAAT	Adjacency	Distance	Bearing	Owner	Latitude (NAD27)	Longitude (NAD27)
100 00	366	1st Adj	82 26	059	RENDA BROADCASTING CORP OF	N29 31 08	W081 19 02
0 00	0	1st Adj	117 73	036		N29 59 40	W081 19 39
2 20	144	1st Adj	74 76	334	ASTERISK COMMUNICATIONS, INC	N29 44 22	W082 23 09
48 00	300	1st Adj	137 14	016	RENDA BROADCASTING CORP OF	N30 19 22	W081 38 34
100 00	168	1st Adj	137 85	197	INFINITY BROADCASTING CORPORAN	N27 56 51	W082 27 33
0 05	57	2nd Adj	11 93	311	BIBLE BROADCASTING NETWORK, I	N29 12 21	W082 08 08
0 25	0	2nd Adj	15 12	289	RFENGINEERS COM, INC	N29 10 51	W082 11 21
81 00	487	3rd Adj	112 62	123	CLEAR CHANNEL BROADCASTING LI	N28 34 51	W081 04 32
0 05	0	Co-Chan	26 86	163	CENTRAL FLORIDA EDUCATIONAL F	N28 54 16	W081 57 36
0 00	0	Co-Chan	146 06	325		N30 13 12	W082 54 00
0 00	0	2nd Adj	62 89	269		N29 07 49	W082 41 19
98 00	309	3rd Adj	134 59	020	CITICASTERS LICENSES L P	N30 16 34	W081 33 53
0 05	63	2nd Adj	40 05	153	BIBLE BROADCASTING NETWORK I	N28 48 47	W081 51 27
0 08	0	Co-Chan	41 51	255	AIRPORT INVESTORS L P	N29 02 09	W082 27 12
0 08	0	Co-Chan	41 51	255	AIRPORT INVESTORS L P	N29 02 09	W082 27 12
0 00	27	2nd Adj	41 61	222	STANDING IN THE GAP INC	N28 51 27	W082 19 45
100 00	302	3rd Adj	134 91	020	CITICASTERS LICENSES L P	N30 16 51	W081 34 12
100 00	235	IF	72 19	332	BOARD OF TRUSTEES UNIVERSITY	N29 42 34	W082 23 40
26 00	134	Co-Chan	219 54	135	VERO BEACH FM RADIO PARTNERS	N27 44 07	W080 27 27
50 00	83	Co-Chan	221 26	139	VERO BEACH FM RADIO PARTNERS	N27 37 32	W080 33 57
0 01	0	1st Adj	55 91	073	EDGEWATER BROADCASTING INC	N29 17 10	W081 29 37
0 00	0	2nd Adj	96 59	270		N29 08 12	W083 02 06
0 17	0	3rd Adj	66 62	260	CHRISTIAN FAMILY RADIO INC	N29 02 11	W082 43 02
0 00	22	3rd Adj	66 78	206	BROOKSVILLE PUBLIC RADIO, INC	N28 35 44	W082 20 45
0 04	0	1st Adj	70 26	039	EDGEWATER BROADCASTING INC	N29 37 51	W081 35 26
25 00	108	IF	90 46	098	MIMS COMMUNITY RADIO INC	N29 01 37	W081 07 18
60 00	137	IF	104 22	216	BIBLE BROADCASTING NETWORK, I	N28 22 39	W082 40 25
0 04	0	1st Adj	88 68	058	EDGEWATER BROADCASTING INC	N29 33 38	W081 16 07

73.207 Analysis

Barry Magrill

Job Daytona Beach Shores-2 fmj

Master Database 2003 Jul 31 fmd

Lat N29 08 10.1 on W082 02 32 NAD-83

Scale 1:1000000

Channel 259 Class A

Status Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF, 1V6

Range 93 km. Clearance 1 CC

Comments No Comments

Description SilverSprings Shores Area to Locate

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Date 8/2/2003 12:12:51 PM

Key

Short

Clear

WBXY



73.207 Analysis

Barry Magrill

Job Daytona Beach Shores-2 fmj

Master Database 2003 Jul 31 fmd

Lat N29 08 10.1 on W082 02 32 NAD-83

Scale 1:250000

Channel 259 Class A

Status Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range 93 km Clearance FCC

Comments No Comments

Description SilverSprings Shores Area to locate

rfInvestigator-FM Version 2.0.70

by rfSoftware, Inc

Date 8/2/2003 12:06:23 PM

Key

Short

Clear

